State of New Jersey
Department of Environmental Protection

Richard J. Codey
Acting Governor

Bradley M. Campbell
Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

DEC 22 2005

Re: L.E. Carpenter Superfund Site
Wharton Borough, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) as well as the United States Environmental Protection Agency (USEPA) have completed a review of the 3rd Quarter Monitoring Report dated October 19, 2005. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP finds the report to be conditionally acceptable provided the following comments are addressed.

General Comments:

LE should note that all of the Natural Attenuation parameters collected, as part of the sampling effort shall be summarized and a discussion provided.

This report provided sampling results of ground water monitoring well samples collected in July 2005 following the conclusion of the source reduction excavations. The results of the sampling confirmed a persistent area of ground water contamination in the vicinity of monitoring wells MW-19 and MW-19-5.

There appears to be some uncertainty with regard to the specific flow path and extent of the contamination based on the current monitoring well network, and recent quarterly reports have recommended adding one or more monitoring wells to help delineate the groundwater plume. The NJDEP/USEPA recommend, however that source area impacted by soils be delineated and a treatment proposed which may help alleviate the need for establishing an Operable Unit – 2, groundwater at the site.

Also, a review of the sampling results indicate high levels of toluene in MW-19-5. According to the NJDEP's Vapor Intrusion Guidance Document (October 2005), a vapor intrusion evaluation must be completed if a receptor is within 30 feet of a BTEX plume or 100 feet if product is suspected. Three residences on Ross Street are within the 100-foot criterion. The high levels of toluene suggest that residual product may be present. Therefore, a vapor intrusion evaluation must be performed. The NJDEP recommends that soil gas samples be taken on the LE side of Ross Street, as well as, on the opposite side of Ross Street (i.e. right of way). LE should be aware that due to the close proximity of residential homes and the persistence of this contaminated source, the NJDEP/USEPA cannot concur with continued monitoring. LE shall propose a work plan within thirty (30) days upon receipt of this correspondence which addresses these issues.

Specific Comments:

Section 2.4, Delineation of Groundwater Contamination, page 2-3: The groundwater sample results from MW-19 and MW-19-5 reported a significant increase in contaminants over previous sampling rounds. Whether this is due to the revised sampling protocol or an actual spike at the source area is not discussed, however the levels suggest that LE consider a more aggressive approach (i.e. active remediation) for the source at the MW-19 area.

Section 3.2, Rockaway River, page 3.2: The report states that surface water sampling at the eastern drainage ditch as well as the Rockaway River and Washington Forge Pond will continue as part of the quarterly sampling. Sample location SW-R-6 shall also be included in the quarterly monitoring.

Section 4.3, Post Source Reduction Site Monitoring, page 4-1: The report states that the proposed site monitoring network will include one additional shallow monitoring well for the MW-19 area. The location of the proposed well is acceptable. The NJDEP must be provided with any details on the installation as well as a schedule for when the monitor well be installed.

Should you have any questions please contact me at (609) 633-1416.

Sincerely,

Anthony Cinque, Case Manager
Bureau of Case Management

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